

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

JANE DOE,

Plaintiff,

v.

Civ. No. 21-709 GBW/SCY

**THE NEW MEXICO BOARD OF
BAR EXAMINERS, and THE
NATIONAL CONFERENCE OF
BAR EXAMINERS,**

Defendants.

**AMENDED MOTION TO SEAL, RESTRICT, OR OTHERWISE LIMIT INSPECTION
OF DOCUMENTS 27 AND 28 FILED WITH THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

COMES NOW Plaintiff, by and through undersigned counsels, and moves this Honorable Court to grant this Motion to Restrict and Seal Documents of the Motion for Leave to Proceed in Forma Pauperis, Doc. 27, and Plaintiff's Motion to Waive Service of Process Fees, Doc. 28 in conjunction the PETITION FOR PERMISSION TO FILE ANONYMOUSLY. Pursuant to Fed. R.Civ.P.5.2(e), for good cause shown the Court may limit or prohibit a non-party's remote electronic access to a document filed with the Court.

The Plaintiff humbly requests that this Court issue an Order directing that previously submitted Documents Numbers 27 and 28 be sealed in conjunction with the PETITION FOR PERMISSION TO FILE ANONYMOUSLY and MOTION TO SEAL, RESTRICT, OR OTHERWISE LIMIT INSPECTION OF THE PETITION FOR PERMISSION TO FILE ANONYMOUSLY WITH THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO.

The Plaintiff respectfully requests to remain anonymous in all documents filed with or in this Court because the subject matter of the case regards currently concealed highly sensitive and medically confidential records protected under federal laws, per the Americans with Disabilities Act (ADA), Health Insurance Portability and Accountability Act of 1996 (HIIPA), and 42 U.S.C. § 12101; 12102.

The Plaintiff has an overriding interest that overcomes the right of public access to the Court records. The Plaintiff currently uses the pseudonym Jane Doe in the Complaint, Amended Complaint, and ensuing documents filed in this court to remain of medical prudence by upholding ADA and HIPPA privacy rights. We kindly seek to, and currently request to, remain in compliance with those federal laws by sealing the Motion for Leave to Proceed in Forma Pauperis, Doc. 27, and by sealing the Plaintiff's Motion to Waive Service of Process Fees, Doc. 28.

This request to conceal personal identifiers with respect to the Plaintiff's federally protected health records can help eradicate additional disability and employment discrimination against the Plaintiff now and in the future. Accordingly, we courteously request this Court to Restrict and Seal Documents of the Motion for Leave to Proceed in Forma Pauperis, Doc. 27, and Plaintiff's Motion to Waive Service of Process Fees, Doc. 28.

Date: September 29, 2021

Respectfully submitted,

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